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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 IN RE: UBER TECHNOLOGIES, INC.,
19 PASSENGER SEXUAL ASSAULT
20 LITIGATION

21 This Document Relates to:

22 *Doe L.N v. Uber Technologies, Inc., et al.*,
23 No. 3:24-cv-00120-CRB

24 *Doe (T.W.) v. Uber Technologies, Inc., et al.*,
25 No. 3:24-cv-00559-CRB

26 *Doe (BW) v. Uber Technologies, Inc., et al.*,
27 No. 3:24-cv-04308-CRB

28 *Doe (ST) v. Uber Technologies, Inc., et al.*,
29 No. 3:24-cv-04309-CRB

30 *Doe (A.R.) v. Uber Technologies, Inc., et al.*,
31 No. 3:24-cv-04313-CRB

32 *Doe (VB) v. Uber Technologies, Inc., et al.*,
33 No. 3:24-cv-04317-CRB

34 *DOE (KH) v. Uber Technologies, Inc., et al.*,
35 No. 3:24-cv-04326-CRB

36 Case No. 3:23-md-03084-CRB

37 **DECLARATION OF STEVEN S.**
38 **SCHULTE IN SUPPORT OF CERTAIN**
39 **NACHAWATI PLAINTIFFS' RESPONSE**
40 **TO DEFENDANTS UBER**
41 **TECHNOLOGIES, INC., RASIER, LLC,**
42 **AND RASIER-CA, LLC'S MOTION**
43 **REGARDING "FRAUDULENT"**
44 **PLAINTIFF FACT SHEETS**

45 Date: February 13, 2026

46 Time: 10:00 a.m.

47 Courtroom: 6 – 17th Floor

1 *Doe (S.F.) v. Uber Technologies, Inc., et al.*,
2 No. 3:24-cv-04327-CRB
3 *Doe (SG) v. Uber Technologies, Inc., et al.*,
4 No. 3:24-cv-04353-CRB
5 *Doe (TW) v. Uber Technologies, Inc., et al.*,
6 No. 3:24-cv-04356-CRB
7 *Doe (SW) v. Uber Technologies, Inc., et al.*,
8 No. 3:24-cv-04364-CRB
9 *Doe (JG) v. Uber Technologies, Inc., et al.*,
10 No. 3:24-cv-04368-CRB
11 *Doe (P.C.) v. Uber Technologies, Inc., et al.*,
12 No. 3:24-cv-04374-CRB
13 *Doe (CA) v. Uber Technologies, Inc., et al.*,
14 No. 3:24-cv-05072-CRB
15 *Doe (R.D.) v. Uber Technologies, Inc., et al.*,
16 No. 3:24-cv-05074-CRB
17 *Doe (J.H.) v. Uber Technologies Inc., et al.*,
18 No. 3:24-cv-05079-CRB
19 *Doe (EB) v. Uber Technologies, Inc., et al.*,
20 No. 3:24-cv-05110-CRB
21 *DOE (AE) v. Uber Technologies, Inc., et al.*,
22 No. 3:24-cv-05121-CRB
23 *Doe (D.G.) v. Uber Technologies, Inc., et al.*,
24 No. 3:24-cv-05169-CRB
25 *Doe (K.H.) v. Uber Technologies, Inc., et al.*,
26 No. 3:24-cv-05174-CRB
27 *Doe (SK) v. Uber Technologies, Inc., et al.*,
28 No. 3:24-cv-05710-CRB
29 *Doe (AM) v. Uber Technologies, Inc., et al.*,
30 No. 3:24-cv-05765-CRB
31 *Doe (CS) v. Uber Technologies, Inc., et al.*,
32 No. 3:24-cv-05964-CRB

1 *Doe (GT) v. Uber Technologies, Inc., et al.*,
2 No. 3:24-cv-06051-CRB

3 *Doe (E.W.) v. Uber Technologies, Inc., et al.*,
4 No. 3:24-cv-06073-CRB

5 *Doe (J.D.) v. Uber Technologies, Inc., et al.*,
6 No. 3:24-cv-06074-CRB

7 *Doe NLG (JV) v. Uber Technologies Inc., et al.*,
8 No. 3:24-cv-08622-CRB

9 *Doe NLG (KC) v. Uber Technologies Inc., et al.*, No. 3:25-cv-00072-CRB

10 *Doe NLG (TT) v. Uber Technologies Inc., et al.*, No. 3:25-cv-00075-CRB

11 *Doe NLG (PO) v. Uber Technologies Inc., et al.*, No. 3:25-cv-00358-CRB

12 *Doe NLG (LB) v. Uber Technologies, Inc., et al.*, No. 3:25-cv-00365-CRB

13 *Doe NLG (BH) v. Uber Technologies Inc., et al.*, No. 3:25-cv-00369-CRB

14 *Doe NLG (BE) v. Uber Technologies Inc., et al.*, No. 3:25-cv-00401-CRB

15 *Doe NLG (KK) v. Uber Technologies, Inc., et al.*, No. 3:25-cv-00673-CRB

16 *Doe NLG (JN) v. Uber Technologies Inc., et al.*, No. 3:25-cv-00715-CRB

17 *Doe NLG (KL) v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01265-CRB

18 *Doe NLG (AH) v. Uber Technologies Inc., et al.*, No. 3:25-cv-01266-CRB

19 *Doe NLG (ZD) v. Uber Technologies Inc., et al.*, No. 3:25-cv-01729-CRB

20 *Doe NLG (WB) v. Uber Technologies Inc., et al.*, No. 3:25-cv-01799-CRB

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1 *Doe NLG (JN) v. Uber Technologies Inc., et al.,*
2 No. 3:25-cv-01818-CRB

3 *DOE NLG (AH) v. Uber Technologies Inc., et*
4 *al., No. 3:25-cv-02797-CRB*

5 *DOE NLG (KM) v. Uber Technologies Inc., et*
6 *al., No. 3:25-cv-02706-CRB*

7 *DOE NLG (AV) v. Uber Technologies Inc., et*
8 *al., No. 3:25-cv-02855-CRB*

9 *Doe NLG (BC) v. Uber Technologies Inc., et al.,*
10 No. 3:25-cv-02899-CRB

11 *Doe NLG (RR) v. Uber Technologies Inc., et al.,*
12 No. 3:25-cv-02788-CRB

13 *Doe NLG (KM) v. Uber Technologies Inc., et*
14 *al., No. 3:25-cv-02956-CRB*

15 *Doe NLG (MH) v. Uber Technologies, et al.,*
16 No. 3:25-cv-05163-CRB

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DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm of Nachawati Law Group (“NLG”), representing several plaintiffs, including the above referenced plaintiffs, in MDL 3084. I am a member in good standing of the State Bar of Texas. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

8 2. This declaration is made in support of Certain Nachawati Plaintiffs' Response to
9 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion Regarding
10 Fraudulent Plaintiff Fact Sheets (ECF No. 4580) ("Certain Nachawati Plaintiffs' Response").

11 3. NLG's records indicate that plaintiffs in cases identified in footnote 2 of Document
12 4522 have become unavailable or non-responsive.

13 4. The exhibits referred below are attached to Certain Nachawati Plaintiffs' Response.
14 They are filed in connection with Certain Nachawati Plaintiffs' Administrative Motion to Seal.

15 5. Attached as **Exhibit 1** is a true and correct copy of Uber Ride Information Form
16 (MDL ID 3201) 85040. This document is filed under seal.

17 6. Attached as **Exhibit 2** is a true and correct copy of Uber Ride Information Form
18 (MDL ID 1496) 16464. This document is filed under seal.

19 7. Attached as **Exhibit 3** is a true and correct copy of Defendant Fact Sheet (MDL ID
20 3207) 92639. This document is filed under seal.

21 8. Attached as **Exhibit 4** is a true and correct copy of First Amended Defendant Fact
22 Sheet (MDL ID 3207) 152658. This document is filed under seal.

23 9. Attached as **Exhibit 5** is a true and correct copy of Defendant Fact Sheet (MDL ID
24 1500) 18280. This document is filed under seal.

25 10. Attached as **Exhibit 6** is a true and correct copy of First Amended Defendant Fact
26 Sheet (MDL ID 1500) 148100. This document is filed under seal.

27 11. Attached as **Exhibit 7** is a true and correct copy of Defendant Fact Sheet (MDL ID
28 2214) 27135. This document is filed under seal.

1 12. Attached as **Exhibit 8** is a true and correct copy of First Amended Defendant Fact
2 Sheet (MDL ID 2214) 33493. This document is filed under seal.

3 13. Attached as **Exhibit 9** is a true and correct copy of Defendant Fact Sheet (MDL ID
4 2231) 27153. This document is filed under seal.

5 14. Attached as **Exhibit 10** is a true and correct copy of First Amended Defendant Fact
6 Sheet (MDL ID 2231) 37309. This document is filed under seal.

8 Executed on December 19, 2025 in Dallas, Texas.

NACHAWATI LAW GROUP

/s/ Steven S. Schulte
Steve Schulte (TX SBN 24051306)